

*Daniel Gravett*

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

[www.dnr.mo.gov](http://www.dnr.mo.gov)

March 31, 2005

CERTIFIED MAIL – 7002 0860 0007 6968 1565  
RETURN RECEIPT REQUESTED

Mr. Joseph Haake  
Group Manager  
The Boeing Company  
Dept. 464C, Bldg. 220  
Mail Code S221-1400  
P.O. Box 516  
St. Louis, MO 63166-0516

RE: Boeing's Resource Conservation and Recovery Act Interim Action Remedial Excavation  
Work Plan (IAWP) Hazelwood, Missouri, Permit # MOD00818963

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has reviewed the January 24, 2005, IAWP and provides the following comments:

Page 2, third paragraph states that the results of the Interim Action will be presented in the Corrective Measures Study, which will evaluate the effectiveness of the Interim Action and determine if additional remedial activities for soil and groundwater are required in these areas. This statement concerns the HWP in that no soil confirmation sampling is being proposed. Some of these areas have not been delineated to the extent that removing a pre-set sized area will assure that all the impacted soil was removed. While the HWP agrees that the risk exceedences were due to groundwater, and not from soils, soils samples are needed to show that the source contamination was removed from the soils to a level that will not continue to leach to groundwater above risk-based levels of concern. The piezometers being proposed could show initial declines in levels, but due to the low permeability of the soils, it is possible that if the entire source is not removed that rebound could happen, past the short-term of monitoring in the wells. It also may be unreasonable to expect any substantial decline in groundwater contaminant concentrations over a six-month period.

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The HWP recommends confirmation soil sampling from the excavation in addition to the peizometers that were proposed in the IAWP. Please include a Short Sampling and Analysis Plan in the revised IAWP. Also included in this Sampling and Analysis section should be a discussion of the remediation waste characterization, management, and disposition protocols including the waste characterization parameters required by any disposal company that may be receiving the excavated remediation waste.

Please revise and send out copies of the revised IAWP in accordance with the applicable permit requirements with 30 days of receipt of this letter. Please consider transmitting the new sampling and analysis plan to the department electronically prior to submittal of the revised IAWP to speed up the review and approval process, so field work is not delayed. If a Sampling and Analysis plan is agreed upon prior to submittal of the IAWP, the HWP can verify that all appropriate changes have been incorporated therein, and issue a final IAWP approval letter to Boeing. If you have any questions concerning this comment letter or require any additional information, please do not hesitate to contact me at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Jill K. Bruss  
Environmental Engineer  
Permits Section

JKB:sw

c: Ms. Joletta Golik, Airport Authority

Mr. Daniel Gravatt, United States Environmental Protection Agency, Region VII ✓ → Doolan  
St. Louis Regional Office